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VIA ECF

The Honorable Anne Y. Shields
United States Magistrate Judge
U.S.D.C., Eastern District of New York
100 Federal Plaza, Courtroom 830
Central Islip, NY 11722

Re: *Stewart v. Hain Celestial Group, Inc.*, Case No. 2:21-cv-678-JS-AYS
Letter Motion for Extension of Deadline to File Responsive Pleading

Dear Judge Shields:

I represent Defendant The Hain Celestial Group, Inc. in the above-referenced action. Pursuant to Section III of this Court's Individual Practice Rules, I write to request a further continuance of Hain Celestial's deadline to file a responsive pleading from April 19, 2021 until June 18, 2021.

Hain Celestial seeks this extension in light of Plaintiffs' pending motion to consolidate all of the pending "baby food" cases in the Eastern District of New York into a single proceeding before Judge Seybert. In that motion, Plaintiffs requested not only that Judge Seybert consolidate the pending "baby food" lawsuits, but also that she set a schedule for the filing of motions for appointment of interim class counsel pursuant to Rule 23(g) and allow Plaintiffs 45 days following the appointment of interim class counsel to submit a consolidated complaint. If Judge Seybert were to grant Plaintiffs' motion, which Hain Celestial did not oppose, Hain Celestial's response to any consolidated complaint would not be due for several months. It is accordingly premature to require Hain Celestial to submit a responsive pleading pending the disposition of that motion, particularly given Plaintiffs' intention to file a consolidated amended complaint at a later date.

This is Hain Celestial's second request for an extension or adjournment of any kind, and the extension will not affect any pending deadlines set by Court order. I have conferred with counsel for Plaintiffs, Janine Pollack, regarding this request, and Ms. Pollack indicated that Plaintiffs consented to Hain Celestial's request for a further extension.

Respectfully submitted,

/s/ Dean N. Panos

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